

July 25, 2005

Mr. William T. O'Connor, Jr.
Vice President - Nuclear Generation
Detroit Edison Company
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMIS 2 - APPROVAL TO USE MORE RECENT INSERVICE TESTING
REQUIREMENTS FOR PRESSURE RELIEF DEVICES (TAC NO. MC6779)

Dear Mr. O'Connor:

By letter dated April 15, 2005, Detroit Edison Company (the licensee) requested the U.S. Nuclear Regulatory Commission's (NRC's) approval to use portions of a more recent edition and addenda of the American Society of Mechanical Engineers (ASME) *Code for Operation and Maintenance of Nuclear Power Plants* (OM Code) for testing pressure relief devices in the Fermi 2 inservice testing (IST) program. The current Code of Record for the Fermi 2 IST Edition of is the 1989 Edition of the ASME *Boiler and Pressure Vessel Code* (Code), Section XI. The 1989 ASME Code, Section XI references ASME OM Standards Part 1, Part 6, and Part 10 for its IST requirements. Licensee requested NRC approval to use the 2001 Edition through the 2003 Addenda of the ASME OM Code for IST of pressure relief valves. Specifically, the Licensee requested to use the ASME OM Code, Subsection ISTA, *General Requirements*, and Mandatory Appendix I, *Inservice Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power Plants*, for pressure relief valve testing at Fermi 2 for the remainder of the second 10-year interval.

The regulations at 50.55a(f)(4)(iv) of Title 10 of the *Code of Federal Regulations* (10 CFR) state that IST of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in 10 CFR 50.55a(b), subject to NRC approval. Portions of edition or addenda may be used provided that all related requirements of the respective editions and addenda are met. The 2001 Edition through 2003 Addenda of the ASME OM Code was incorporated by reference into 10 CFR 50.55a(b) on October 1, 2004 (69 FR 58804), and became effective on November 1, 2004, with no modifications or limitations placed on ASME OM Code, Subsection ISTA or Mandatory Appendix I requirements involving pressure relief valve testing. Further, the NRC staff has identified no related requirements in the specified later edition and addenda that would also need to be met to implement the requested subsection ISTA and mandatory Appendix I.

W. O'Connor

-2-

Therefore, the licensee's request to use the 2001 Edition through the 2003 Addenda of the ASME OM Code for IST of pressure relief valves at Fermi 2 for the remainder of the second 10-year interval is approved pursuant to 10 CFR 50.55a(f)(4)(iv).

Sincerely,

/RA/

L. Raghavan, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-341

cc: See next page

W. O'Connor

-2-

Therefore, the licensee's request to use the 2001 Edition through the 2003 Addenda of the ASME OM Code for IST of pressure relief valves at Fermi 2 for the remainder of the second 10-year interval is approved pursuant to 10 CFR 50.55a(f)(4)(iv).

Sincerely,

/RA/

L. Raghavan, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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cc: See next page

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